

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
THOMAS A. MCKAY  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

kking@maglaw.com  
(212) 880-9403

SENIOR COUNSEL  
PAUL R. GRAND

COUNSEL  
JASMINE JUTEAU

ROBERT G. MORVILLO  
1938-2011

MICHAEL C. SILBERBERG  
1940-2002

JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.

\*\*ALSO ADMITTED IN CONNECTICUT

April 5, 2024

VIA ECF

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

Re: *Maria Elena Swett Urquieta v. John Francis Bowe*, 1:24-cv-01379-PAE

Dear Judge Engelmayer:

We represent the Respondent, John Bowe, in the above-referenced action. Pursuant to Your Honor's Individual Rules and Practices in Civil Cases and the discussion at the final pretrial conference, Respondent respectfully requests permission to redact portions of his Exhibit List that discuss highly personal facts relating to S.B.S. that relate to the grave risk defense, before filing on the public docket.

Although the Exhibit List is a "judicial document" to which the presumption of public access applies, *see Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016), there exist countervailing privacy interests here, specifically related to "sensitive personal information" involving children. *See Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152, 156 (S.D.N.Y. 2015). Furthermore, the child at issue, S.B.S. is a nonparty. Accordingly, we believe the requested redactions are appropriate. *See e.g., Arulpragasam v. Bronfman*, No. 13-CV-2472, 2013 WL 2249256 (E.D.N.Y. 2013) (allowing parties to redact child's information to protect his privacy and safety, but not revise the caption for anonymity). Petitioners join this application.

We are available to discuss this application at the Court's convenience.

Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

/s/ Karen King  
Karen King

GRANTED.

SO ORDERED.



---

PAUL A. ENGELMAYER  
United States District Judge  
April 9, 2024